

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

NAUTILUS INSURANCE COMPANY,

Plaintiff,

v.

RICHARD ALEXANDER MURDAUGH,  
SR., CORY FLEMING, MOSS & KUHN,  
P.A., CHAD WESTENDORF, and  
PALMETTO STATE BANK,

Defendants.

Case No.: 2:22-cv-1307-RMG

**PLAINTIFF NAUTILUS INSURANCE  
COMPANY’S MOTION TO DEPOSE  
INCARCERATED PERSONS**

Nautilus Insurance Company (“Nautilus”) moves pursuant to Rule 30(a)(2)(B), Fed. R. Civ. P., for leave from this Court to take the depositions of Mr. Russell Lucius Laffitte (“Mr. Laffitte”) and Mr. Richard Alexander Murdaugh, Sr. (“Mr. Murdaugh”)<sup>1</sup> regarding the matters set forth in Nautilus Second Amended Complaint, as follows.

**I. Mr. Laffitte**

Mr. Laffitte, a non-party to this case, is currently an inmate of Federal Correctional Institution (“FCI”) Coleman Low in Sumterville, Florida. He was the executive officer of Defendant Palmetto State Bank (“PSB”) who authorized his subordinate officer at PSB, Defendant Chad Westendorf (“Mr. Westendorf”), to serve as a fiduciary in the Satterfield matter at Mr. Murdaugh’s request, having declined to serve himself. Nautilus contends that, without Mr. Westendorf’s service as a fiduciary at Mr. Murdaugh’s request, the scheme to defraud Nautilus could never have been effected.

Accordingly, Nautilus seeks leave to depose Mr. Laffitte about his knowledge regarding

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<sup>1</sup> Undersigned counsel is in communication with counsel for Defendant Cory Fleming about alternatives to taking Mr. Fleming’s deposition. However, it is possible Nautilus may seek leave from this Court for such a deposition in the future.

Mr. Murdaugh's scheme to defraud Nautilus, his decision not to serve as the Personal Representative for the Estate of Gloria Satterfield, his decision on PSB's behalf to authorize Mr. Westendorf's service at Mr. Murdaugh's request, and the considerations that shaped those decisions.

Nautilus would also seek to question Mr. Laffitte on matters such as his familiarity and awareness of the Satterfield family, Gloria Satterfield's fall and subsequent death, and the claims against Mr. Murdaugh in the Satterfield matters, as well as his knowledge of and any actions in connection with the application of funds converted from the Satterfield matter, and the handling of related checks issued by Mr. Murdaugh and made payable to PSB or himself, which were then applied by Mr. Laffitte to various debts Mr. Murdaugh owed to PSB in 2019.

## **II. Mr. Murdaugh**

Mr. Murdaugh, the first-named Defendant in this case, has requested that he be protected from deposition until after his trial on state criminal charges, a trial set to begin on November 27, 2023. *See* ECF No. 167. Nautilus is amenable to this request, and respectfully requests that the Court authorize Nautilus to take Mr. Murdaugh's deposition following the conclusion of his upcoming trial.

**Respectfully submitted:**

This 4th day of October, 2023  
Charleston, South Carolina

/s/ Jaan Rannik  
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